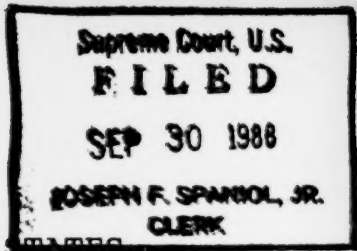


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No. 88 - 220

SUPREME COURT OF THE UNITED STATES
OCTOBER TERM 1988

CHERYL ANN VIELLE,

Petitioner,

v.

WILLIAM JOSEPH BAISLEY,

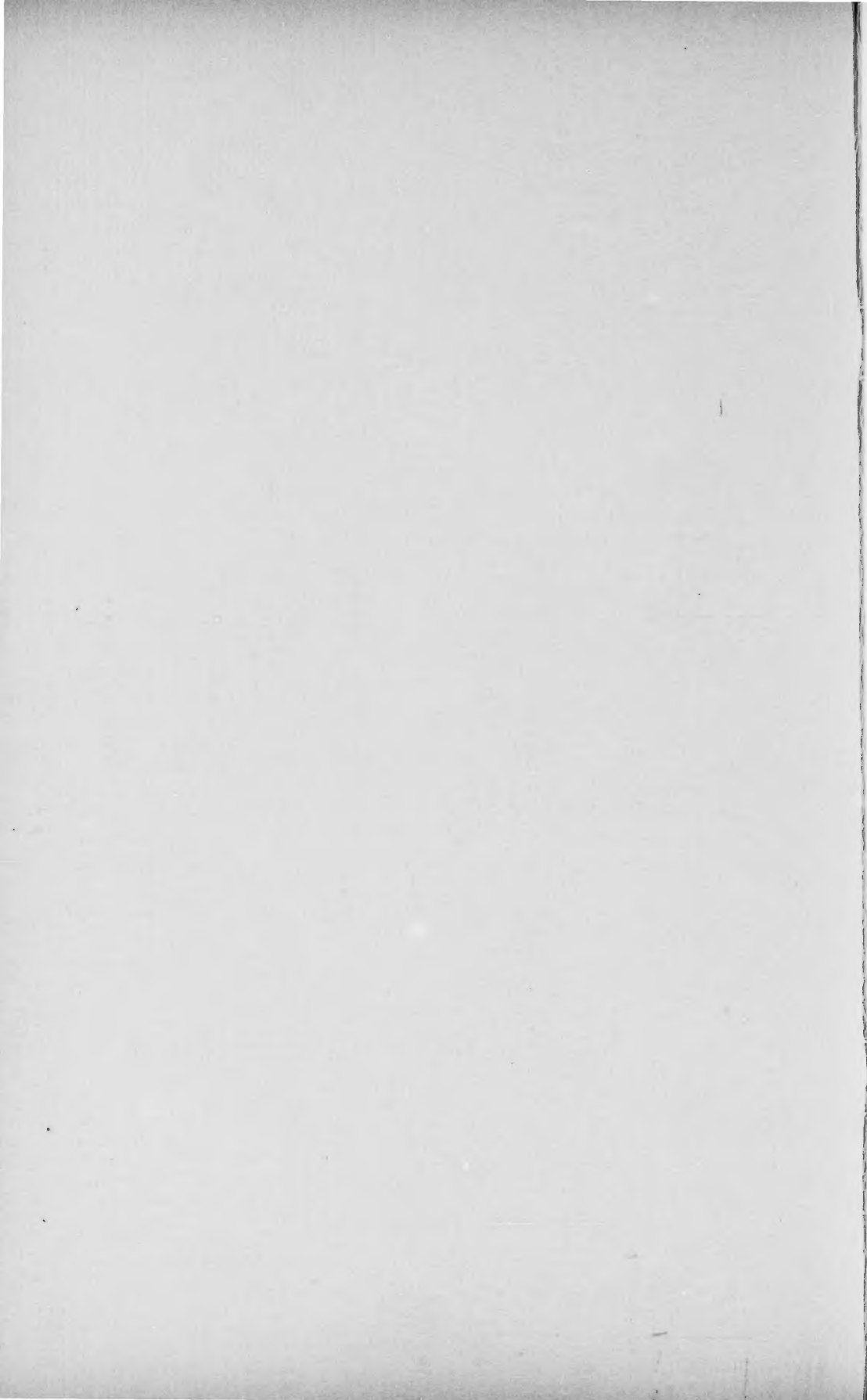
Respondent.

OBJECTION TO FILING OF BRIEF AMICUS CURIAE
BY BLACKFEET TRIBE

Nancy S. Terrill
Counsel of Record
Edwards, Terrill
& Pizzi
1227 Spruce Street
Boulder, CO 80302
(303) 442-0600

October, 1988

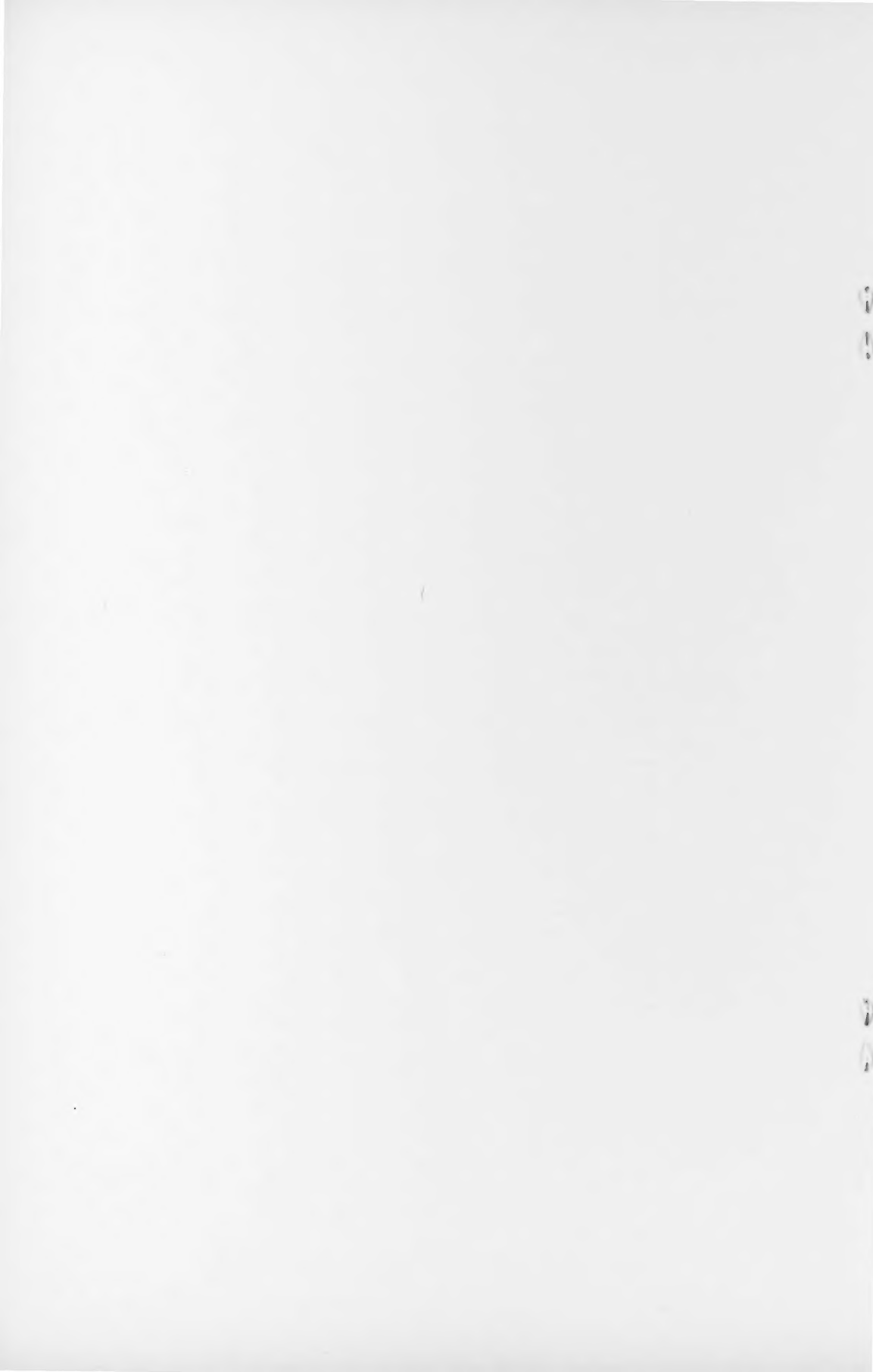
3 pp



**OBJECTION TO FILING OF
BRIEF AMICUS CURIAE BY BLACKFEET TRIBE**

The Respondent, William Joseph Baisley, through his counsel, Nancy S. Terrill, hereby states the following objection to the filing of the Brief Amicus Curiae by the Blackfeet Tribe pursuant to Supreme Court Rule 36.3:

1. On September 23, 1988, the Blackfeet Tribe filed a Motion for Leave to File Brief Amicus Curiae in this case.
2. Respondent had withheld consent to such filing because the Tribe had notified him, through counsel, that it intended to raise issues not raised in the trial court or Colorado Court of Appeals.
3. By failing to appear earlier in the lengthy proceedings involving



this case, the Tribe failed to establish a record upon which to base the arguments contained in its Brief and thus such are not properly before this Court.

WHEREFORE, the Respondent respectfully requests this Court to deny the Motion of the Blackfeet Tribe.

DATED this 11th day of October, 1988.

Respectfully submitted,

EDWARDS, TERRILL & PIZZI

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